

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARIA JOSE PIZARRO,

Plaintiff,

20-CV-5783 (AKH)

-against-

EUROS EL TINA RESTAURANT LOUNGE
and BILLIARDS CORP. and SANTIAGO
QUEZADA,

Defendants.

X

**DECLARATION OF MARIA JOSE PIZARRO IN SUPPORT OF MOTION TO FIX
ATTORNEYS FEES AND COSTS**

MARIA JOSE PIZARRO declare that the following is true and correct:

1. I am the Plaintiff in the above-captioned action, which arose out of the sexual harassment and sexual assault by Santiago Quezada.
2. I submit this declaration to request that the Court grant my motion for attorneys' fees and costs.
3. I began working at Euros El Tina, a restaurant and bar, in September 2010. Between that time and when my employment ended in November 2019, I was subject to a continuous pattern of sexual harassment/hostile work environment by my boss, Defendant Santiago Quesada, Senior. He grabbed my breasts from behind against my will; left the bathroom door open as he urinated, just feet from my desk, exposing his penis to me each time, and even masturbated in front of me. I objected each time he did these things but he didn't stop. On October 18, 2019, Defendant Quesada, Senior grabbed me from behind, pinned my arms in front of me as he pulled down my pants and underwear and pressed his

penis against my bare buttocks as a tried to break free. Luckily someone walked in and stopped the sexual assault.

4. I have suffered severe emotional distress as a result of what Defendant Quezada, Senior did to me.
5. Brustein Law PLLC has represented me since January 2020.
6. Evan Brustein has represented me as the sole attorney on my case until Mark Marino was brought on to assist with the litigation in June 2021.
7. Throughout his representation of me, Mr. Brustein has kept me advised of the progression of the case, and we have discussed the strategy of litigating the case throughout the case. I have been impressed by Mr. Brustein's knowledge and skill in the representing me in this employment discrimination case, as well as the decisions he made early on in the case that resulted in favorable rulings for me in advance of the trial.
8. I have found Mr. Brustein to be a dedicated and hard-working attorney, who has put considerable time and energy into prosecuting my case, for which I am very thankful.
9. Mr. Brustein is worth at least \$550/hour if not more.
10. When Mr. Brustein discussed bringing Mr. Marino on to assist with the case in June of 2021, he spoke highly of him and told me that his legal writing would help the case.
11. In the time that Mr. Marino has been representing me, I have also been happy to have him representing me and felt that his addition to the case was beneficial.
12. I support the Court awarding Mr. Brustein an hourly rate of \$550 and Mr. Marino an hourly rate of \$425.
13. For the reasons stated above, I request that the Court grant my fee petition.
14. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 30, 2023
Queens, New York



Maria Jose Pizarro

Sworn to before me this

30 day of November, 2023



Notary Public

Commission Expires: 09/28/2027

<p>SUSY DENYFS REBOLLEDO Notary Public - State of New York No. 01RE0013905 Qualified in Queens County My Commission Expires September 28, 20<u>27</u></p>
